



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

December 14, 2023

**BY ECF**

Hon. Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *International Refugee Assistance Project, Inc. v. United States Citizenship and Immigration Services*, 23 Civ. 9604 (KPF)

Dear Judge Failla:

This Office represents the defendant agency in this Freedom of Information Act (FOIA) case. With plaintiff's consent, I respectfully write to provide a status report, propose a further status report in approximately two months, and request an adjournment of the initial conference the Court previously scheduled for January 30, 2024. *See* ECF No. 6.

Plaintiff's FOIA request seeks records and data from U.S. Citizenship and Immigration Services ("USCIS") relating to the agency's procedures for determining whether an applicant has a qualifying family relationship for immigration purposes. *See generally* Complaint, ECF No. 1.

USCIS has completed its initial searches for records and is currently processing the resulting material for responsiveness and any applicable FOIA exemptions. The agency expects to complete all processing by the end of January 2024 and make a production to plaintiffs. Once plaintiff has received and reviewed that production, the parties intend to confer about any questions plaintiff may have. In order to allow this process to occur, we respectfully propose that the parties provide a further status report in approximately two months, or by February 16, 2024.

Separately, the parties do not believe an initial conference is necessary at this time. We therefore respectfully request that the Court adjourn the January 30 conference without a future date. If, by the mid-February status report, either party believes that a conference would be appropriate, the party may make a renewed request for a conference.

Honorable Katherine Polk Failla  
December 14, 2023

Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: Monica Beamer  
MONICA BEAMER  
Special Assistant United States Attorney  
PETER ARONOFF  
Assistant United States Attorney  
Telephone: (212) 637-2697  
Facsimile: (212) 637-2717  
E-mail: peter.aronoff@usdoj.gov  
monica.beamer@usdoj.gov

*Counsel for Defendants*

cc: Counsel for Plaintiffs (via ECF)

Application GRANTED. The initial pretrial conference scheduled for January 30, 2024, is hereby ADJOURNED *sine die*. The parties shall provide the Court with a status report on or before **February 16, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket number 10.

Dated: December 15, 2023  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE